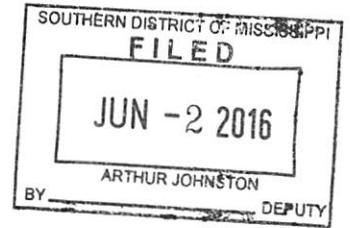


IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



LAWANDA BARNES

Plaintiff,

v.

CASE NO.: 3:16-cv-413 HTW-LRA

CONN APPLIANCES, INC.

DEMAND FOR TRIAL BY JURY

Defendants.

_____ /

COMPLAINT

Plaintiff, Lawanda Barnes (hereinafter “Ms. Barnes”), by and through the undersigned counsel, sues Defendant, Conn Appliances, Inc., and in support thereof respectfully alleges violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* (“TCPA”).

INTRODUCTION

1. The TCPA was enacted to prevent companies like Conn Appliances, Inc. from invading American citizen’s privacy and to prevent abusive “robo-calls.”

2. “The TCPA is designed to protect individual consumers from receiving intrusive and unwanted telephone calls.” *Mims v. Arrow Fin. Servs., LLC*, 132 S. Ct. 740 (2012).

3. “Senator Hollings, the TCPA’s sponsor, described these calls as ‘the scourge of modern civilization, they wake us up in the morning; they interrupt our dinner at night; they force the sick and elderly out of bed; they hound us until we want to rip the telephone out of the wall.’ 137 Cong. Rec. 30, 821 (1991). Senator Hollings presumably intended to give telephone subscribers another option: telling the autodialers to simply stop calling.” *Osorio v. State Farm Bank, F.S.B.*, 746 F. 3d 1242 (11th Cir. 2014).

4. According to the Federal Communications Commission (FCC), "Unwanted calls and texts are the number one complaint to the FCC. There are thousands of complaints to the FCC every month on both telemarketing and robocalls. The FCC received more than 215,000 TCPA complaints in 2014." *Fact Sheet: Wheeler Proposal to Protect and Empower Consumers Against Unwanted Robocalls, Texts to Wireless Phones*, Federal Communications Commission, (May 27, 2015), https://apps.fcc.gov/edocs_public/attachmatch/DOC-333676A1.pdf.

JURISDICTION AND VENUE

5. Jurisdiction and venue, for purposes of this action, are appropriate and conferred by 28 U.S.C. § 1331, Federal Question Jurisdiction, as this action involves violations of the TCPA.

6. Subject matter jurisdiction and federal question jurisdiction, for purposes of this action, are appropriate and conferred by 28 U.S.C. § 1331, which provides that the District Courts shall have original jurisdiction of all civil actions arising under the Constitution, laws or treaties of the United States; and, this action involves violations of 47 U.S.C. § 227(v)(1)(A)(iii). *See Mims v. Arrow Fin. Servs., LLC*, S.Ct. 740, 748 (2012) and *Osorio v. State Farm Bank, F.S.B.*, 746 F.3d 1242, 1249 (11th Cir. 2014).

7. Venue is proper in this District as Ms. Barnes resides within this District in Hinds County, Mississippi, the violations described in the Complaint occurred in this District and Defendant transacts within Hinds County, Mississippi.

FACTUAL ALLEGATIONS

8. Ms. Barnes is a natural person and citizen of the State of Mississippi whom resides in Hinds County, Mississippi.

9. Ms. Barnes is the “called party.” See *Breslow v. Wells Fargo Bank, N.A.*, 755 F.3d 1265 (11th Cir. 2014) and *Osorio v. State Farm Bank, F.S.B.*, 746 F.3d 1242 (11th Cir. 2014).

10. Defendant, Conn Appliances, Inc. (hereinafter “Defendant”), is a Texas corporation with its principal place of business located at 4055 Technology Forest Boulevard, Suite 210, The Woodlands, TX 77381 and which may be served with process through its Registered Agent, C T Corporation System, at 645 Lakeland East Drive, Suite 101, Flowood, Mississippi 39232.

11. Defendant is a corporate entity responsible for attempting to collect a consumer debt from Ms. Barnes and is transacting business within the State of Mississippi.

12. Ms. Barnes is the subscriber, regular user and carrier of the cellular telephone number at issue in this matter, (769) XXX-1466 (hereinafter “cellular telephone”).

13. Ms. Barnes was the called party and recipient of Defendant’s hereinafter described calls.

14. Defendant repeatedly called Ms. Barnes on Ms. Barnes’ cellular telephone.

15. Defendant intentionally harassed and abused Ms. Barnes on numerous occasions by calling several times during one day, and, on back to back days, with such frequency as can reasonably be expected to harass.

16. Despite its knowledge the subject account was for another party, Defendant attempted to collect a debt from Ms. Barnes by this campaign of telephone calls.

17. At all times material hereto, Defendant attempted to collect on an alleged debt, (hereinafter “subject account”), which was and/or is serviced by Defendant and which is allegedly owed by Mr. Isaac Barnes, Ms. Barnes’ son.

18. Defendant intentionally, knowingly and/or willfully harassed and abused Ms. Barnes on numerous occasions by calling Ms. Barnes' cellular telephone, from approximately August 2014 through February 2015, with such frequency as can reasonably be expected to harass, all in effort related to the collection of the subject account.

19. Upon information and belief, each of the calls Defendant placed to Ms. Barnes' cellular telephone were placed using an "automatic telephone dialing system" (hereinafter ATDS") which has the ability and capacity to store or produce telephone numbers to be called, without human intervention, using a random or sequential number generator (including, without limitation, a predictive dialer); and, to dial such numbers as specified by 47 U.S. C. § 227(a)(1).

20. Furthermore, most, if not all, of the calls at issue were placed by Defendant using a "prerecorded voice," as specified by the TCPA, 47 U.S.C. § 227(b)(1)(A).

21. Ms. Barnes was neither a signor nor co-signor on the subject account.

22. In or about August 2014, Defendant initiated its campaign of harassing phone calls to Ms. Barnes on her cellular telephone.

23. Defendant called Ms. Barnes at least five hundred ninety (590) times in an attempt to collect on the subject account from September 2014 through January 2015.

24. Upon receipt of the calls, Ms. Barnes' caller identification feature identified the calls were being initiated from, but not limited to, the following phone numbers:

- i. (409) 242-6994;
- ii. (409) 242-6998;
- iii. (409) 261-5006;
- iv. (409) 291-5067;
- v. (409) 291-5135;
- vi. (409) 291-5136;
- vii. (409) 291-5137;
- viii. (409) 291-5844;
- ix. (409) 291-5864;
- x. (409) 291-5865;

- xi. (409) 291-5870;
- xii. (409) 291-7003;
- xiii. (409) 291-8588;
- xiv. (409) 291-8803;
- xv. (409) 293-3121;
- xvi. (409) 293-3122;
- xvii. (409) 293-3123;
- xviii. (409) 299-3557;
- xix. (409) 299-3561;
- xx. (409) 299-4593;
- xxi. (409) 299-4610;
- xxii. (409) 299-5994;
- xxiii. (409) 761-5430;
- xxiv. (409) 761-5431; and
- xxv. (409) 761-5432.

25. Upon each answered call, Ms. Barnes notified Defendant she was not the intended party Defendant was attempting to contact.

26. Upon each answered call, Ms. Barnes instructed Defendant to immediately cease all calls her cellular telephone.

27. In or about late September 2014, Ms. Barnes recalls specifically instructing Defendant to cease all calls to Ms. Barnes's cellular telephone.

28. Each subsequent call Defendant made to Ms. Barnes' cellular telephone was done so without the "express permission" of Ms. Barnes.

29. Ms. Barnes' requests of Defendant demanding an immediate cessation of the harassing phone calls to her cellular telephone were summarily and wholly ignored by Defendant.

30. Despite actual knowledge that Ms. Barnes was not the intended party Defendant was attempting to contact, Defendant continued its onslaught of calls to Ms. Barnes' cellular telephone, to include calls on back to back days and several calls throughout the same day.

31. Defendant intentionally harassed and abused Ms. Barnes on numerous occasions by calling several times during one day, and on back to back days, with such frequency as can reasonably be expected to harass.

32. Due to the extreme volume of calls Ms. Barnes received from Defendant, Ms. Barnes was unable to maintain a fully contemporaneous log of each and every call she received; however, the following is a sampling of calls Ms. Barnes received per her cellular telephone records:

- i. September 6, 2014 at 12:47 PM from telephone number (409) 242-6998;
- ii. September 13, 2014 at 9:14 AM from telephone number (409) 291-5865;
- iii. September 13, 2014 at 12:04 PM from telephone number (409) 291-5865;
- iv. September 13, 2014 at 1:53 PM from telephone number (409) 291-5865;
- v. September 13, 2014 at 2:25 PM from telephone number (409) 291-5865;
- vi. September 13, 2014 at 3:33 PM from telephone number (409) 291-5865;
- vii. September 14, 2014 at 11:12 AM from telephone number (409) 291-5864;
- viii. September 15, 2014 at 9:35 AM from telephone number (409) 291-5006;
- ix. September 15, 2014 at 1:54 PM from telephone number (409) 291-5006;
- x. September 15, 2014 at 6:07 PM from telephone number (409) 291-5006;
- xi. September 15, 2014 at 7:26 PM from telephone number (409) 291-5006;
- xii. September 16, 2014 at 9:11 AM from telephone number (409) 291-5844;
- xiii. September 16, 2014 at 11:58 PM from telephone number (409) 291-5844;
- xiv. September 16, 2014 at 3:23 PM from telephone number (409) 291-5844;
- xv. September 16, 2014 at 6:17 PM from telephone number (409) 291-5844;
- xvi. September 17, 2014 at 8:59 AM from telephone number (409) 291-5870;
- xvii. September 17, 2014 at 11:46 AM from telephone number (409) 291-5870;
- xviii. September 17, 2014 at 1:37 PM from telephone number (409) 291-5870;
- xix. September 17, 2015 at 2:15 PM from telephone number (409) 291-5870;
- xx. September 17, 2014 at 7:19 PM from telephone number (409) 291-5870;
- xxi. September 19, 23014 at 8:39 AM from telephone number (409-) 291-5864;
- xxii. September 21, 2014 at 5:09 PM from telephone number (409) 291-5135;
- xxiii. September 22, 2014 at 8:17 AM from telephone number (409) 291-5137;
- xxiv. September 22, 2014 at 12:21 PM from telephone number (409) 291-5137;
- xxv. September 22, 2014 at 12:43 PM from telephone number (409) 291-5137;
- xxvi. September 22, 2014 at 3:08 PM from telephone number (409) 291-5137;
- xxvii. September 22, 2014 at 6:14 PM from telephone number (409) 291-5137;
- xxviii. September 23, 2014 at 8:06 AM from telephone number (409) 291-5067;
- xxix. September 23, 2014 at 11:32 AM from telephone number (409) 291-5067;
- xxx. September 23, 2014 at 1:46 PM from telephone number (409) 291-5067;
- xxxi. September 23, 2014 at 3:01 PM from telephone number (409) 291-5067;
- xxxii. September 23, 2014 at 6:08 PM from telephone number (409) 291-5097;

- xxxiii. September 24, 2014 at 8:34 AM from telephone number (409) 291-7003;
- xxxiv. September 24, 2014 at 11:17 AM from telephone number (409) 291-7003;
- xxxv. September 24, 2014 at 12:58 PM from telephone number (409) 291-7003;
- xxxvi. September 24, 2014 at 2:36 PM from telephone number (409) 291-7003;
- xxxvii. September 24, 2014 at 6:24 PM from telephone number (409) 291-7003;
- xxxviii. September 25, 2014 at 8:34:18 AM from telephone number (409) 291-8588;
- xxxix. September 25, 2014 at 8:34:33 AM from telephone number (409) 291-8588;
- xl. September 25, 2014 at 11:05 AM from telephone number (409) 291-8588;
- xli. September 25, 2014 at 1:29 PM from telephone number (409) 291-8588;
- xl.ii. September 25, 2014 at 2:00 PM from telephone number (409) 291-8588;
- xl.iii. September 25, 2014 at 2:54 PM from telephone number (409) 291-8588;
- xl.iv. September 25, 2014 at 3:21 PM from telephone number (409) 291-8588;
- xl.v. September 25, 2014 at 6:19 PM from telephone number (409) 291-8588;
- xlvi. September 26, 2014 at 8:06 AM from telephone number (409) 291-8803;
- xl.vii. September 26, 2014 at 9:32 AM from telephone number (409) 291-8803;
- xl.viii. September 26, 2014 at 10:42 AM from telephone number (409) 291-8803;
- xl.ix. September 26, 2014 at 11:00 AM from telephone number (409) 291-8803;
- l. September 26, 2014 at 11:56 AM from telephone number (409) 291-8803;
- li. September 26, 2014 at 1:43 PM from telephone number (409) 291-8803;
- lii. September 27, 2014 at 8:21 AM from telephone number (409) 299-3557;
- lii.iii. September 27, 2014 at 11:19 AM from telephone number (409) 299-3557;
- liv. September 27, 2014 at 12:05 PM from telephone number (409) 299-3557;
- lv. September 27, 2014 at 1:06 PM from telephone number (409) 299-3557;
- lvi. September 27, 2014 at 3:12 PM from telephone number (409) 299-3557;
- lvii. September 28, 2014 at 12:15 PM from telephone number (409) 291-5136;
- lviii. September 29, 2014 at 8:23 AM from telephone number (409) 299-3561;
- lix. September 29, 2014 at 11:10 AM from telephone number (409) 299-3561;
- lx. September 29, 2014 at 12:24 PM from telephone number (409) 299-3561;
- lxi. September 29, 2014 at 3:20 PM from telephone number (409) 299-3561;
- lxii. September 29, 2014 at 4:29 PM from telephone number (409) 299-3561;
- lxiii. September 29, 2014 at 6:08 PM from telephone number (409) 299-3561;
- lxiv. September 30, 2014 at 8:17 AM from telephone number (409) 299-4593;
- lxv. September 30, 2014 at 12:39 PM from telephone number (409) 299-4593;
- lxvi. September 30, 2014 at 3:02 PM from telephone number (409) 299-4593;
- lxvii. September 30, 2014 at 6:04 PM from telephone number (409) 299-4593;
- lxviii. October 1, 2014 at 9:39 AM from telephone number (409) 299-4610;
- lxix. October 3, 2014 at 8:10 AM from telephone number (409) 242-6998;
- lxx. October 4, 2014 at 8:05 AM from telephone number (409) 293-3121;
- lxxi. October 4, 2014 at 10:37 AM from telephone number (409) 293-3121;
- lxxii. October 4, 2014 at 11:13 AM from telephone number (409) 293-3121;
- lxxiii. October 4, 2014 at 3:09 PM from telephone number (409) 293-3121;
- lxxiv. October 6, 2014 at 8:44 AM from telephone number (409) 293-3123;
- lxxv. October 6, 2014 at 11:10 AM from telephone number (409) 293-3123;
- lxxvi. October 6, 2014 at 12:12 PM from telephone number (409) 293-3123;
- lxxvii. October 6, 2014 at 3:05 PM from telephone number (409) 293-3123;
- lxxviii. October 6, 2014 at 6:18 PM from telephone number (409) 293-3123;

- lxxix. October 6, 2014 at 8:50 PM from telephone number (409) 293-3123;
- lxxx. October 7, 2014 at 8:11 AM from telephone number (409) 299-5994;
- lxxxi. October 7, 2014 at 11:10 AM from telephone number (409) 299-5994;
- lxxxii. October 7, 2014 at 3:00 PM from telephone number (409) 299-5994;
- lxxxiii. October 7, 2014 at 6:18 PM from telephone number (409) 299-5994;
- lxxxiv. October 8, 2014 at 8:50 AM from telephone number (409) 761-5430;
- lxxxv. October 8, 2014 at 11:38 AM from telephone number (409) 761-5430;
- lxxxvi. October 8, 2014 at 3:20 PM from telephone number (409) 761-5430;
- lxxxvii. October 8, 2014 at 6:01 PM from telephone number (409) 761-5430;
- lxxxviii. October 9, 2014 at 8:03 AM from telephone number (409) 761-5431;
- lxxxix. October 9, 2014 at 11:00 AM from telephone number (409) 761-5431;
- xc. October 9, 2014 at 1:49 PM from telephone number (409) 761-5431;
- xc. October 9, 2014 at 3:13 PM from telephone number (409) 761-5431;
- xcii. October 9, 2014 at 6:38 PM from telephone number (409) 761-5431;
- xciii. October 10, 2014 at 9:17 AM from telephone number (409) 291-5865;
- xciv. October 10, 2014 at 11:55 AM from telephone number (409) 291-5865;
- xcv. October 10, 2014 at 1:41 PM from telephone number (409) 291-5865;
- xcvi. October 10, 2014 at 3:11 PM from telephone number (409) 291-5865;
- xcvii. October 10, 2014 at 4:43 PM from telephone number (409) 291-5865;
- xcviii. October 11, 2014 at 8:41 AM from telephone number (409) 291-5864;
- xcix. October 11, 2014 at 10:44 AM from telephone number (409) 291-5864;
- c. October 11, 2014 at 12:44 PM from telephone number (409) 291-5864;
- ci. October 11, 2014 at 2:30 PM from telephone number (409) 291-5864;
- cii. October 11, 2014 at 2:55 PM from telephone number (409) 291-5864;
- ciii. October 11, 2014 at 5:11 PM from telephone number (409) 291-5864;
- civ. October 11, 2014 at 7:21 PM from telephone number (409) 291-5864;
- cv. October 12, 2014 at 12:28 PM from telephone number (409) 291-5006;
- cvi. October 12, 2014 at 6:52:17 PM from telephone number (409) 291-5006;
- cvi. October 12, 2014 at 6:52:52 PM from telephone number (409) 291-5006;
- cvi. October 13, 2014 at 8:35 AM from telephone number (409) 291-5844;
- cix. October 13, 2014 at 10:48 AM from telephone number (409) 291-5844;
- cx. October 13, 2014 at 1:10 PM from telephone number (409) 291-5844;
- cx. October 13, 2014 at 1:48 PM from telephone number (409) 291-5844;
- cxii. October 13, 2014 at 5:56 PM from telephone number (409) 291-5844;
- cxiii. October 14, 2014 at 8:58 AM from telephone number (409) 291-5870;
- cxiv. October 14, 2014 at 11:34 AM from telephone number (409) 291-5870;
- cxv. October 14, 2014 at 12:46 PM from telephone number (409) 291-5870;
- cxvi. October 14, 2014 at 1:32 PM from telephone number (409) 291-5870;
- cxvii. October 14, 2014 at 3:30 PM from telephone number (409) 291-5870;
- cxviii. October 14, 2014 at 5:55 PM from telephone number (409) 291-5870;
- cxix. October 14, 2014 at 6:11 PM from telephone number (409) 291-5870;
- cxx. October 15, 2014 at 8:57 AM from telephone number (409) 291-5864;
- cxxi. October 15, 2014 at 11:26 AM from telephone number (409) 291-5864;
- cxxii. October 15, 2014 at 2:05 PM from telephone number (409) 291-5864;
- cxxiii. October 15, 2014 at 4:53 PM from telephone number (409) 291-5864;
- cxxiv. October 15, 2014 at 5:15 PM from telephone number (409) 291-5864;

cxxv. October 15, 2014 at 6:59 PM from telephone number (409) 291-5864;
 cxxvi. October 16, 2014 at 9:02 AM from telephone number (409) 291-7003;
 cxxvii. October 16, 2014 at 10:52 AM from telephone number (409) 291-7003;
 cxxviii. October 16, 2014 at 12:03 PM from telephone number (409) 291-7003;
 cxxix. October 16, 2014 at 1:19 PM from telephone number (409) 291-7003;
 cxxx. October 16, 2014 at 5:15 PM from telephone number (409) 291-7003;
 cxxxi. October 16, 2014 at 6:38 PM from telephone number (409) 291-7003;
 cxxxii. October 17, 2014 at 8:32 AM from telephone number (409) 291-5067;
 cxxxiii. October 17, 2014 at 3:04 PM from telephone number (409) 291-5067;
 cxxxiv. October 18, 2014 at 8:26 AM from telephone number (409) 291-5135;
 cxxxv. October 18, 2014 at 10:17 AM from telephone number (409) 291-5135;
 cxxxvi. October 18, 2014 at 11:40 AM from telephone number (409) 291-5135;
 cxxxvii. October 18, 2014 at 2:30 PM from telephone number (409) 291-5135;
 cxxxviii. October 18, 2014 at 3:47 PM from telephone number (409) 291-5135;
 cxxxix. October 18, 2014 at 3:48 PM from telephone number (409) 291-5135;
 cxl. October 19, 2014 at 11:31 AM from telephone number (409) 291-5137;
 cxli. October 19, 2014 at 2:37 PM from telephone number (409) 291-5137;
 cxlii. October 19, 2014 at 2:38 PM from telephone number (409) 291-5137;
 cxliii. October 19, 2014 at 3:54 PM from telephone number (409) 291-5137;
 cxliv. October 19, 2014 at 4:56 PM from telephone number (409) 291-5137;
 cxlv. October 19, 2014 at 6:18 PM from telephone number (409) 291-5137;
 cxlvi. October 20, 2014 at 9:07 AM from telephone number (409) 291-5067;
 cxlvii. October 20, 2014 at 11:20 AM from telephone number (409) 291-5067;
 cxlviii. October 20, 2014 at 2:19 PM from telephone number (409) 291-5067;
 cxlix. October 20, 2014 at 3:30 PM from telephone number (409) 291-5067;
 cl. October 20, 2014 at 5:08 PM from telephone number (409) 291-5067;
 cli. October 20, 2014 at 8:52 PM from telephone number (409) 291-5067;
 clii. October 21, 2014 at 8:44 AM from telephone number (409) 291-7003;
 cliii. October 21, 2014 at 10:26 AM from telephone number (409) 291-7003;
 cliv. October 21, 2014 at 11:15 AM from telephone number (409) 291-7003;
 clv. October 21, 2014 at 1:16 PM from telephone number (409) 291-7003;
 clvi. October 21, 2014 at 1:36 PM from telephone number (409) 291-7003;
 clvii. October 21, 2014 at 2:28 PM from telephone number (409) 291-7003;
 clviii. October 21, 2014 at 4:35 PM from telephone number (409) 291-7003;
 clix. October 22, 2014 at 9:17 AM from telephone number (409) 291-8588;
 clx. October 22, 2014 at 11:15 AM from telephone number (409) 291-8588;
 clxi. October 22, 2014 at 1:47 PM from telephone number (409) 291-8588;
 clxii. October 23, 2014 at 9:14 AM from telephone number (409) 291-8803;
 clxiii. October 23, 2014 at 12:59 PM from telephone number (409) 291-8803;
 clxiv. October 23, 2014 at 1:39 PM from telephone number (409) 291-8803;
 clxv. October 23, 2014 at 3:17 PM from telephone number (409) 291-8803;
 clxvi. October 23, 2014 at 5:29 PM from telephone number (409) 291-8803;
 clxvii. October 24, 2014 at 8:52 AM from telephone number (409) 291-3557;
 clxviii. October 24, 2014 at 12:56 PM from telephone number (409) 291-3557;
 clxix. October 24, 2015 at 1:47 PM from telephone number (409) 291-3557;
 clxx. October 24, 2014 at 3:12 PM from telephone number (409) 291-3557;

clxxi. October 24, 2014 at 7:47 PM from telephone number (409) 291-3557;
 clxxii. October 25, 2014 at 8:33 AM from telephone number (409) 291-5136;
 clxxiii. October 25, 2014 at 11:33 AM from telephone number (409) 291-5136;
 clxxiv. October 25, 2014 at 1:27 PM from telephone number (409) 291-5136;
 clxxv. October 25, 2014 at 2:48 PM from telephone number (409) 291-5136;
 clxxvi. October 25, 2014 at 4:25 PM from telephone number (409) 291-5136;
 clxxvii. October 25, 2014 at 6:01 PM from telephone number (409) 291-5136;
 clxxviii. October 26, 2014 at 10:39 AM from telephone number (409) 299-3561;
 clxxix. October 26, 2014 at 11:47 AM from telephone number (409) 299-3561;
 clxxx. October 27, 2014 at 8:44 AM from telephone number (409) 299-4593;
 clxxxi. October 27, 2014 at 11:31 AM from telephone number (409) 299-4593;
 clxxxii. October 27, 2014 at 1:43 PM from telephone number (409) 299-4593;
 clxxxiii. October 27, 2014 at 3:07 PM from telephone number (409) 299-4593;
 clxxxiv. October 27, 2014 at 3:56 PM from telephone number (409) 299-4593;
 clxxxv. October 27, 2014 at 6:14 PM from telephone number (409) 299-4593;
 clxxxvi. October 27, 2014 at 6:14 PM from telephone number (409) 299-4593;
 clxxxvii. October 28, 2014 at 8:52 AM from telephone number (409) 299-4610;
 clxxxviii. October 28, 2014 at 11:20 AM from telephone number (409) 299-4610;
 clxxxix. October 28, 2014 at 1:08 PM from telephone number (409) 299-4610;
 cxc. October 28, 2014 at 2:10 PM from telephone number (409) 299-4610;
 cxci. October 28, 2014 at 3:05 PM from telephone number (409) 299-4610;
 cxcii. October 28, 2014 at 5:27 PM from telephone number (409) 299-4610;
 cxciii. October 28, 2014 at 8:19 PM from telephone number (409) 299-4610;
 cxciv. October 29, 2014 at 8:37 AM from telephone number (409) 242-6994;
 cxcv. October 29, 2014 at 2:20 PM from telephone number (409) 242-6994;
 cxcvi. October 29, 2014 at 3:17 PM from telephone number (409) 242-6994;
 cxcvii. October 30, 2014 at 3:16 PM from telephone number (409) 242-6998;
 cxcviii. October 30, 2014 at 8:29 PM from telephone number (409) 242-6998;
 cxcix. October 31, 2014 at 8:28 AM from telephone number (409) 293-3121;
 cc. October 31, 2014 at 10:54 AM from telephone number (409) 293-3121;
 cci. October 31, 2014 at 12:28 PM from telephone number (409) 293-3121;
 ccii. October 31, 2014 at 1:35 PM from telephone number (409) 293-3121;
 cciii. October 31, 2014 at 3:19 PM from telephone number (409) 293-3121;
 cciv. October 31, 2014 at 8:39 PM from telephone number (409) 293-3121;
 ccv. November 1, 2014 at 9:12 AM from telephone number (409) 293-3122;
 ccvi. November 1, 2014 at 2:21 PM from telephone number (409) 293-3122;
 ccvii. November 1, 2014 at 5:39 PM from telephone number (409) 293-3122;
 ccviii. November 2, 2014 at 12:13 PM from telephone number (409) 293-3123;
 ccix. November 3, 2014 at 8:25 AM from telephone number (409) 299-5994;
 ccx. November 3, 2014 at 9:32 AM from telephone number (409) 299-5994;
 ccxi. November 3, 2014 at 1:18 PM from telephone number (409) 299-5994;
 ccxii. November 3, 2014 at 5:05 PM from telephone number (409) 299-5994;
 ccxiii. November 3, 2014 at 5:36 PM from telephone number (409) 299-5994;
 ccxiv. November 3, 2014 at 8:37 PM from telephone number (409) 299-5994;
 ccxv. November 4, 2014 at 9:02 AM from telephone number (409) 761-5430;
 ccxvi. November 4, 2014 at 10:59 AM from telephone number (409) 761-5430;

ccxvii. November 4, 2014 at 11:04 AM from telephone number (409) 761-5430;
 ccxviii. November 4, 2014 at 12:41 PM from telephone number (409) 761-5430;
 ccxix. November 4, 2014 at 2:59 PM from telephone number (409) 761-5430;
 ccxx. November 4, 2014 at 3:50 PM from telephone number (409) 761-5430;
 ccxxi. November 4, 2014 at 5:45 PM from telephone number (409) 761-5430;
 ccxxii. November 4, 2014 at 5:56 PM from telephone number (409) 761-5430;
 ccxxiii. November 5, 2014 at 12:56 PM from telephone number (409) 761-5431;
 ccxxiv. November 5, 2014 at 5:43 PM from telephone number (409) 761-5431;
 ccxxv. November 5, 2014 at 6:21 PM from telephone number (409) 761-5431;
 ccxxvi. November 6, 2014 at 9:04 AM from telephone number (409) 291-5865;
 ccxxvii. November 6, 2014 at 11:53 AM from telephone number (409) 291-5865;
 ccxxviii. November 6, 2014 at 11:53 AM from telephone number (409) 291-5865;
 ccxxix. November 6, 2014 at 12:31 PM from telephone number (409) 291-5865;
 ccxxx. November 6, 2014 at 12:59 PM from telephone number (409) 291-5865;
 ccxxxi. November 6, 2014 at 5:12 PM from telephone number (409) 291-5865;
 ccxxxii. November 6, 2014 at 5:36 PM from telephone number (409) 291-5865;
 ccxxxiii. November 6, 2014 at 7:24 PM from telephone number (409) 291-5865;
 ccxxxiv. November 7, 2014 at 8:03 AM from telephone number (409) 291-5864;
 ccxxxv. November 7, 2014 at 10:54 AM from telephone number (409) 291-5864;
 ccxxxvi. November 7, 2014 at 10:55 AM from telephone number (409) 291-5864;
 ccxxxvii. November 7, 2014 at 10:59 AM from telephone number (409) 291-5864;
 ccxxxviii. November 7, 2014 at 2:26 PM from telephone number (409) 291-5864;
 ccxxxix. November 7, 2014 at 2:59 PM from telephone number (409) 291-5864;
 ccxli. November 7, 2014 at 37 PM from telephone number (409) 291-5864;
 ccxlii. November 8, 2014 at 8:17 AM from telephone number (409) 291-5006;
 ccxliii. November 8, 2014 at 10:38 AM from telephone number (409) 291-5006;
 ccxliv. November 8, 2014 at 10:59 AM from telephone number (409) 291-5006;
 ccxlv. November 8, 2014 at 1:14 PM from telephone number (409) 291-5006;
 ccxlv. November 8, 2014 at 2:47 PM from telephone number (409) 291-5006;
 ccxlv. November 8, 2014 at 7:41 PM from telephone number (409) 291-5006;
 ccxlvii. November 8, 2014 at 7:41 PM from telephone number (409) 291-5006;
 ccxlviii. November 10, 2014 at 10:08 from telephone number (409) 291-5870;
 ccxlix. November 10, 2014 at 12:32 PM from telephone number (409) 291-5870;
 ccl. November 10, 2014 at 12:49 PM from telephone number (409) 291-5870;
 ccli. November 11, 2014 at 10:59 AM from telephone number (409) 291-5864;
 cclii. November 11, 2014 at 12:39 PM from telephone number (409) 291-5864;
 ccliii. November 11, 2014 at 1:39 PM from telephone number (409) 291-5864;
 ccliv. November 11, 2014 at 5:09 PM from telephone number (409) 291-5864;
 cclv. November 11, 2014 at 7:22 PM from telephone number (409) 291-5864;
 cclvi. November 12, 2014 at 8:23 AM from telephone number (409) 291-7003;
 cclvii. November 12, 2014 at 10:43 AM from telephone number (409) 291-7003;
 cclviii. November 12, 2014 at 12:51 PM from telephone number (409) 291-7003;
 cclix. November 12, 2014 at 5:45 PM from telephone number (409) 291-7003;
 cclx. November 12, 2014 at 7:41 PM from telephone number (409) 291-7003;
 cclxi. November 13, 2014 at 10:23 AM from telephone number (409) 291-5067;
 cclxii. November 13, 2014 at 1:20 PM from telephone number (409) 291-5067;

cclxiii. November 13, 2014 at 5:25 PM from telephone number (409) 291-5067;
 cclxiv. November 13, 2014 at 5:26 PM from telephone number (409) 291-5067;
 cclxv. November 13, 2014 at 7:33 PM from telephone number (409) 291-5067;
 cclxvi. November 14, 2014 at 8:05 AM from telephone number (409) 291-5135;
 cclxvii. November 14, 2014 at 9:36 AM from telephone number (409) 291-5135;
 cclxviii. November 14, 2014 at 12:14 PM from telephone number (409) 291-5135;
 cclxix. November 14, 2014 at 1:21 PM from telephone number (409) 291-5135;
 cclxx. November 14, 2014 at 3:03 PM from telephone number (409) 291-5135;
 cclxxi. November 14, 2014 at 4:02 PM from telephone number (409) 291-5135;
 cclxxii. November 14, 2014 at 4:17 PM from telephone number (409) 291-5135;
 cclxxiii. November 15, 2014 at 8:03 AM from telephone number (409) 291-5137;
 cclxxiv. November 15, 2014 at 12:33 PM from telephone number (409) 291-5137;
 cclxxv. November 15, 2014 at 1:39 PM from telephone number (409) 291-5137;
 cclxxvi. November 15, 2014 at 6:33 PM from telephone number (409) 291-5137;
 cclxxvii. November 15, 2014 at 6:33 PM from telephone number (409) 291-5137;
 cclxxviii. November 15, 2014 at 6:34 PM from telephone number (409) 291-5137;
 cclxxix. November 15, 2014 at 6:35 PM from telephone number (409) 291-5137;
 cclxxx. November 17, 2014 at 9:14 AM from telephone number (409) 291-7003;
 cclxxxi. November 17, 2014 at 10:48 AM from telephone number (409) 291-7003;
 cclxxxii. November 17, 2014 at 3:23 PM from telephone number (409) 291-7003;
 cclxxxiii. November 18, 2014 at 10:46 AM from telephone number (409) 291-8588;
 cclxxxiv. November 18, 2014 at 12:45 PM from telephone number (409) 291-8588;
 cclxxxv. November 18, 2014 at 1:50 PM from telephone number (409) 291-8588;
 cclxxxvi. November 18, 2014 at 3:11 PM from telephone number (409) 291-8588;
 cclxxxvii. November 18, 2014 at 6:22 PM from telephone number (409) 291-8588;
 cclxxxviii. November 19, 2014 at 10:21 AM from telephone number (409) 291-8803;
 cclxxxix. November 19, 2014 at 2:31 PM from telephone number (409) 291-8803;
 ccxc. November 19, 2014 at 6:15 PM from telephone number (409) 291-8803;
 ccxci. November 20, 2014 at 8:24 AM from telephone number (409) 299-3557;
 ccxcii. November 20, 2014 at 12:47 PM from telephone number (409) 299-3557;
 ccxciii. November 20, 2014 at 3:13 PM from telephone number (409) 299-3557;
 ccxciv. November 20, 2014 at 6:19 PM from telephone number (409) 299-3557;
 ccxcv. November 21, 2014 at 10:22 AM from telephone number (409) 291-5136;
 ccxcvi. November 21, 2014 at 12:26 PM from telephone number (409) 291-5136;
 ccxcvii. November 21, 2014 at 1:04 PM from telephone number (409) 291-5136;
 ccxcviii. November 21, 2014 at 1:04 PM from telephone number (409) 291-5136;
 ccxcix. November 21, 2014 at 2:15 PM from telephone number (409) 291-5136;
 ccc. November 21, 2014 at 4:17 PM from telephone number (409) 291-5136;
 ccci. November 21, 2014 at 7:10 PM from telephone number (409) 291-5136;
 cccii. November 22, 2014 at 8:12 AM from telephone number (409) 299-3561;
 ccciii. November 22, 2014 at 10:27 AM from telephone number (409) 299-3561;
 ccciv. November 22, 2014 at 11:27 AM from telephone number (409) 299-3561;
 cccv. November 22, 2014 at 12:45 PM from telephone number (409) 299-3561;
 cccvi. November 23, 2014 at 3:08 PM from telephone number (409) 299-4593;
 cccvii. November 24, 2014 at 8:17 AM from telephone number (409) 299-4610;
 cccviii. November 24, 2014 at 10:13 AM from telephone number (409) 299-4610;

cccix. November 24, 2014 at 2:15 PM from telephone number (409) 299-4610;
 cccx. November 24, 2014 at 3:29 PM from telephone number (409) 299-4610;
 cccxi. November 24, 2014 at 4:18 PM from telephone number (409) 299-4610;
 cccxii. November 24, 2014 at 5:58 PM from telephone number (409) 299-4610;
 cccxiii. November 25, 2014 at 8:08 AM from telephone number (409) 299-6994;
 cccxiv. November 25, 2014 at 10:13 AM from telephone number (409) 299-6994;
 cccxv. November 25, 2014 at 12:35 PM from telephone number (409) 299-6994;
 cccxvi. November 25, 2014 at 1:33 PM from telephone number (409) 299-6994;
 cccxvii. November 25, 2014 at 2:44 PM from telephone number (409) 299-6994;
 cccxviii. November 25, 2014 at 5:10 PM from telephone number (409) 299-6994;
 cccxix. November 26, 2014 at 8:13 AM from telephone number (409) 242-6998;
 cccxx. November 26, 2014 at 9:25 AM from telephone number (409) 299-6998;
 cccxxi. November 26, 2014 at 12:51 PM from telephone number (409) 299-6998;
 cccxxii. November 26, 2014 at 2:12 PM from telephone number (409) 299-6998;
 cccxxiii. November 26, 2014 at 3:26 PM from telephone number (409) 299-6998;
 cccxxiv. November 26, 2014 at 3:55 PM from telephone number (409) 299-6998;
 cccxxv. November 28, 2014 at 10:13 AM from telephone number (409) 293-3122;
 cccxxvi. November 28, 2014 at 7:09 PM from telephone number (409) 293-3122;
 cccxxvii. November 29, 2014 at 8:06 AM from telephone number (409) 293-3123;
 cccxxviii. November 29, 2014 at 10:14 AM from telephone number (409) 293-3123;
 cccxxix. November 29, 2014 at 12:51 PM from telephone number (409) 293-3123;
 cccxxx. November 29, 2014 at 1:31 PM from telephone number (409) 293-3123;
 cccxxxi. November 29, 2014 at 2:45 PM from telephone number (409) 293-3123;
 cccxxxii. November 29, 2014 at 6:03 PM from telephone number (409) 293-3123;
 cccxxxiii. December 1, 2014 at 12:52 PM from telephone number (409) 761-5430;
 cccxxxiv. December 1, 2014 at 3:14 PM from telephone number (409) 761-5430;
 cccxxxv. December 1, 2014 at 5:18 PM from telephone number (409) 761-5430;
 cccxxxvi. December 2, 2014 at 8:21 AM from telephone number (409) 761-5431;
 cccxxxvii. December 2, 2014 at 10:23 AM from telephone number (409) 761-5431;
 cccxxxviii. December 2, 2014 at 12:37 PM from telephone number (409) 761-5431;
 cccxxxix. December 2, 2014 at 3:10 PM from telephone number (409) 761-5431;
 cccxl. December 2, 2014 at 4:20 PM from telephone number (409) 761-5431;
 cccxli. December 2, 2014 at 6:04 PM from telephone number (409) 761-5431;
 cccxlii. December 2, 2014 at 6:22 PM from telephone number (409) 761-5431;
 cccxliii. December 3, 2014 at 8:29 AM from telephone number (409) 291-5865;
 cccxliv. December 3, 2014 at 10:51 AM from telephone number (409) 291-5865;
 cccxlv. December 3, 2014 at 11:00 AM from telephone number (409) 291-5865;
 cccxlvi. December 3, 2014 at 1:55 PM from telephone number (409) 291-5865;
 cccxlvii. December 3, 2014 at 4:58 PM from telephone number (409) 291-5865;
 cccxlviii. December 4, 2014 at 8:28 AM from telephone number (409) 291-5864;
 cccxlix. December 4, 2014 at 10:09 AM from telephone number (409) 291-5864;
 cccl. December 4, 2014 at 10:25 AM from telephone number (409) 291-5864;
 cccli. December 4, 2014 at 12:39 PM from telephone number (409) 291-5864;
 ccclii. December 4, 2014 at 1:17 PM from telephone number (409) 291-5864;
 cccliii. December 4, 2014 at 5:28 PM from telephone number (409) 291-5864;
 cccliv. December 4, 2014 at 7:33 PM from telephone number (409) 291-5864;

ccclv. December 5, 2014 at 9:57 AM from telephone number (409) 291-5006;
 ccclvi. December 5, 2014 at 10:40 AM from telephone number (409) 291-5006;
 ccclvii. December 5, 2014 at 10:56 AM from telephone number (409) 291-5006;
 ccclviii. December 5, 2014 at 2:45 PM from telephone number (409) 291-5006;
 ccclix. December 6, 2014 at 8:26 AM from telephone number (409) 291-5844;
 ccclx. December 6, 2014 at 10:16 AM from telephone number (409) 291-5844;
 ccclxi. December 6, 2014 at 11:04 AM from telephone number (409) 291-5844;
 ccclxii. December 6, 2014 at 11:48 AM from telephone number (409) 291-5844;
 ccclxiii. December 6, 2014 at 1:01 PM from telephone number (409) 291-5844;
 ccclxiv. December 6, 2014 at 3:14 PM from telephone number (409) 291-5844;
 ccclxv. December 6, 2014 at 6:07 PM from telephone number (409) 291-5844;
 ccclxvi. December 8, 2014 at 8:11 AM from telephone number (409) 291-5864;
 ccclxvii. December 8, 2014 at 10:21 AM from telephone number (409) 291-5864;
 ccclxviii. December 8, 2014 at 10:29 AM from telephone number (409) 291-5864;
 ccclxix. December 8, 2014 at 10:30 AM from telephone number (409) 291-5864;
 ccclxx. December 8, 2014 at 12:38 PM from telephone number (409) 291-5864;
 ccclxxi. December 8, 2014 at 2:30 PM from telephone number (409) 291-5864;
 ccclxxii. December 8, 2014 at 6:06 PM from telephone number (409) 291-5864;
 ccclxxiii. December 9, 2014 at 10:23 AM from telephone number (409) 291-7003;
 ccclxxiv. December 9, 2014 at 11:27 AM from telephone number (409) 291-7003;
 ccclxxv. December 9, 2014 at 12:42 PM from telephone number (409) 291-7003;
 ccclxxvi. December 9, 2014 at 4:04 PM from telephone number (409) 291-7003;
 ccclxxvii. December 9, 2014 at 6:17 PM from telephone number (409) 291-7003;
 ccclxxviii. December 10, 2014 at 8:27 AM from telephone number (409) 291-5067;
 ccclxxix. December 10, 2014 at 11:22 AM from telephone number (409) 291-5067;
 ccclxxx. December 10, 2014 at 4:25 PM from telephone number (409) 291-5067;
 ccclxxxi. December 10, 2014 at 7:15 PM from telephone number (409) 291-5067;
 ccclxxxii. December 11, 2014 at 8:25 AM from telephone number (409) 291-5135;
 ccclxxxiii. December 11, 2014 at 8:26 AM from telephone number (409) 291-5135;
 ccclxxxiv. December 11, 2014 at 10:22 AM from telephone number (409) 291-5135;
 ccclxxxv. December 11, 2014 at 2:44 PM from telephone number (409) 291-5135;
 ccclxxxvi. December 11, 2014 at 4:16 PM from telephone number (409) 291-5135;
 ccclxxxvii. December 11, 2014 at 6:05 PM from telephone number (409) 291-5135;
 ccclxxxviii. December 12, 2014 at 11:20 AM from telephone number (409) 291-5137;
 ccclxxxix. December 12, 2014 at 11:53 AM from telephone number (409) 291-5137;
 cccxc. December 12, 2014 at 1:13 PM from telephone number (409) 291-5137;
 cccxci. December 12, 2014 at 3:34 PM from telephone number (409) 291-5137;
 cccxcii. December 12, 2014 at 4:36 PM from telephone number (409) 291-5137;
 cccxciii. December 13, 2014 at 8:39 AM from telephone number (409) 291-7003;
 cccxciv. December 13, 2014 at 11:31 AM from telephone number (409) 291-7003;
 cccxcv. December 13, 2014 at 11:32 AM from telephone number (409) 291-7003;
 cccxcvi. December 13, 2014 at 1:03 PM from telephone number (409) 291-7003;
 cccxcvii. December 13, 2014 at 4:38 PM from telephone number (409) 291-7003;
 cccxcviii. December 13, 2014 at 7:15 PM from telephone number (409) 291-7003;
 cccxcix. December 15, 2014 at 8:23 AM from telephone number (409) 291-8803;
 cd. December 15, 2014 at 11:56 AM from telephone number (409) 291-8803;

cdi. December 15, 2014 at 11:57 AM from telephone number (409) 291-8803;
 cdii. December 15, 2014 at 12:39 PM from telephone number (409) 291-8803;
 cdiii. December 15, 2014 at 4:28 PM from telephone number (409) 291-8803;
 cdv. December 15, 2014 at 7:00 PM from telephone number (409) 291-8803;
 cdvi. December 16, 2014 at 12:44 PM from telephone number (409) 299-3557;
 cdvii. December 16, 2014 at 1:12 PM from telephone number (409) 299-3557;
 cdviii. December 16, 2014 at 4:31 PM from telephone number (409) 299-3557;
 cdviii. December 16, 2014 at 6:27 PM from telephone number (409) 299-3557;
 cdix. December 17, 2014 at 8:42 AM from telephone number (409) 291-5136;
 cdx. December 17, 2014 at 10:14 AM from telephone number (409) 291-5136;
 cdx. December 17, 2014 at 12:51 PM from telephone number (409) 291-5136;
 cdxii. December 17, 2014 at 5:37 PM from telephone number (409) 291-5136;
 cdxiii. December 17, 2014 at 6:19 PM from telephone number (409) 291-5136;
 cdxiv. December 18, 2014 at 8:54 AM from telephone number (409) 299-3561;
 cdxv. December 18, 2014 at 10:46 AM from telephone number (409) 299-3561;
 cdxvi. December 18, 2014 at 12:49 PM from telephone number (409) 299-3561;
 cdxvii. December 18, 2014 at 5:48 PM from telephone number (409) 299-3561;
 cdxviii. December 18, 2014 at 6:31 PM from telephone number (409) 299-3561;
 cdxix. December 19, 2014 at 9:45 AM from telephone number (409) 299-4593;
 cdxx. December 19, 2014 at 10:49 AM from telephone number (409) 299-4593;
 cdxxi. December 19, 2014 at 11:42 AM from telephone number (409) 299-4593;
 cdxxii. December 19, 2014 at 1:04 PM from telephone number (409) 299-4593;
 cdxxiii. December 19, 2014 at 3:15 PM from telephone number (409) 299-4593;
 cdxxiv. December 19, 2014 at 3:49 PM from telephone number (409) 299-4593;
 cdxxv. December 20, 2014 at 8:23 AM from telephone number (409) 299-4610;
 cdxxvi. December 20, 2014 at 11:49 AM from telephone number (409) 299-4610;
 cdxxvii. December 20, 2014 at 12:51 PM from telephone number (409) 299-4610;
 cdxxviii. December 20, 2014 at 4:26 PM from telephone number (409) 299-4610;
 cdxxix. December 20, 2014 at 6:41 PM from telephone number (409) 299-4610;
 cdxxx. December 22, 2014 at 8:22 AM from telephone number (409) 242-6998;
 cdxxxi. December 22, 2014 at 9:15 AM from telephone number (409) 242-6998;
 cdxxxii. December 22, 2014 at 4:39 PM from telephone number (409) 242-6998;
 cdxxxiii. December 22, 2014 at 6:02 PM from telephone number (409) 242-6998;
 cdxxxiv. December 23, 2014 at 8:18 AM from telephone number (409) 293-3121;
 cdxxxv. December 23, 2014 at 10:23 AM from telephone number (409) 293-3121;
 cdxxxvi. December 23, 2014 at 12:47 PM from telephone number (409) 293-3121;
 cdxxxvii. December 23, 2014 at 2:58 PM from telephone number (409) 293-3121;
 cdxxxviii. December 23, 2014 at 7:50 PM from telephone number (409) 293-3121;
 cdxxxix. December 23, 2014 at 7:55 PM from telephone number (409) 293-3121;
 cdxl. December 24, 2014 at 8:40 AM from telephone number (409) 293-3122;
 cdxli. December 24, 2014 at 10:11 AM from telephone number (409) 293-3122;
 cdxlii. December 24, 2014 at 10:18 AM from telephone number (409) 293-3122;
 cdxliii. December 24, 2014 at 2:40 PM from telephone number (409) 293-3122;
 cdxliv. December 24, 2014 at 3:46 PM from telephone number (409) 293-3122;
 cdxlv. December 26, 2014 at 8:44 AM from telephone number (409) 293-5994;
 cdxlv. December 26, 2014 at 10:22 AM from telephone number (409) 293-5994;

cdxlvi. December 26, 2014 at 1:49 PM from telephone number (409) 293-5994;
 cdxlviii. December 26, 2014 at 3:22 PM from telephone number (409) 293-5994;
 cdxlix. December 26, 2014 at 4:38 PM from telephone number (409) 293-5994;
 cdl. December 27, 2014 at 8:16 AM from telephone number (409) 761-5430;
 cdl. December 27, 2014 at 9:55 AM from telephone number (409) 761-5430;
 cdlii. December 27, 2014 at 10:43 AM from telephone number (409) 761-5430;
 cdliii. December 27, 2014 at 11:51 AM from telephone number (409) 761-5430;
 cdliiv. December 27, 2014 at 2:33 PM from telephone number (409) 761-5430;
 cdlv. December 29, 2014 at 8:19 AM from telephone number (409) 761-5432;
 cdlvi. December 29, 2014 at 9:59 AM from telephone number (409) 761-5432;
 cdlvii. December 29, 2014 at 10:23 AM from telephone number (409) 761-5432;
 cdlviii. December 29, 2014 at 12:48 PM from telephone number (409) 761-5432;
 cdlix. December 29, 2014 at 3:03 PM from telephone number (409) 761-5432;
 cdlix. December 29, 2014 at 4:42 PM from telephone number (409) 761-5432;
 cdlixi. December 29, 2014 at 7:14 PM from telephone number (409) 761-5432;
 cdlixi. December 30, 2014 at 8:25 AM from telephone number (409) 291-5865;
 cdlixi. December 30, 2014 at 11:32 AM from telephone number (409) 291-5865;
 cdlixi. December 30, 2014 at 12:48 PM from telephone number (409) 291-5865;
 cdlixi. December 30, 2014 at 2:58 PM from telephone number (409) 291-5865;
 cdlixi. December 30, 2014 at 4:26 PM from telephone number (409) 291-5865;
 cdlixi. December 30, 2014 at 7:35 PM from telephone number (409) 291-5865;
 cdlixi. December 30, 2014 at 7:36 PM from telephone number (409) 291-5865;
 cdlixi. December 31, 2014 at 9:53 AM from telephone number (409) 291-5864;
 cdlixi. December 31, 2014 at 2:51 PM from telephone number (409) 291-5864;
 cdlixi. December 31, 2014 at 4:01 PM from telephone number (409) 291-5864;
 cdlixi. December 31, 2014 at 4:12 PM from telephone number (409) 291-5864;
 cdlixi. December 31, 2014 at 4:56 PM from telephone number (409) 291-5864;
 cdlixi. January 2, 2015 at 8:15 AM from telephone number (409) 291-5844;
 cdlixi. January 2, 2015 at 10:16 AM from telephone number (409) 291-5844;
 cdlixi. January 2, 2015 at 11:01 AM from telephone number (409) 291-5844;
 cdlixi. January 2, 2015 at 12:00 PM from telephone number (409) 291-5844;
 cdlixi. January 2, 2015 at 12:01 PM from telephone number (409) 291-5844;
 cdlixi. January 2, 2015 at 3:30 PM from telephone number (409) 291-5844;
 cdlixi. January 2, 2015 at 4:06 PM from telephone number (409) 291-5844;
 cdlixi. January 2, 2015 at 7:21 PM from telephone number (409) 291-5844;
 cdlixi. January 3, 2015 at 9:27 AM from telephone number (409) 291-5870;
 cdlixi. January 3, 2015 at 3:21 PM from telephone number (409) 291-5870;
 cdlixi. January 3, 2015 at 6:28 PM from telephone number (409) 291-5870;
 cdlixi. January 5, 2015 at 11:24 AM from telephone number (409) 291-7003;
 cdlixi. January 5, 2015 at 12:45 PM from telephone number (409) 291-7003;
 cdlixi. January 5, 2015 at 4:38 PM from telephone number (409) 291-7003;
 cdlixi. January 5, 2015 at 7:18 PM from telephone number (409) 291-7003;
 cdlixi. January 5, 2015 at 7:41 PM from telephone number (409) 291-7003;
 cdxc. January 6, 2015 at 8:29 AM from telephone number (409) 291-5067;
 cdxc. January 6, 2015 at 11:10 AM from telephone number (409) 291-5067;
 cdxc. January 6, 2015 at 4:23 PM from telephone number (409) 291-5067;

cdxciii. January 6, 2015 at 6:28 PM from telephone number (409) 291-5067;
 cdxciv. January 6, 2015 at 6:36 PM from telephone number (409) 291-5067;
 cdxcv. January 7, 2015 at 9:06 PM from telephone number (409) 291-5135;
 cdxcvi. January 7, 2015 at 10:45 AM from telephone number (409) 291-5135;
 cdxcvii. January 7, 2015 at 2:11 PM from telephone number (409) 291-5135;
 cdxcviii. January 7, 2015 at 3:50 PM from telephone number (409) 291-5135;
 cdxcix. January 7, 2015 at 4:20 PM from telephone number (409) 291-5135;
 d. January 7, 2015 at 6:04 PM from telephone number (409) 291-5135;
 di. January 7, 2015 at 6:35 PM from telephone number (409) 291-5135;
 dii. January 8, 2015 at 8:43 AM from telephone number (409) 291-5137;
 diii. January 8, 2015 at 11:33 AM from telephone number (409) 291-5137;
 div. January 8, 2015 at 6:45 PM from telephone number (409) 291-5137;
 dv. January 9, 2015 at 8:27 AM from telephone number (409) 291-7003;
 dvi. January 9, 2015 at 10:35 AM from telephone number (409) 291-7003;
 dvii. January 9, 2015 at 10:35 AM from telephone number (409) 291-7003;
 dviii. January 9, 2015 at 12:08 PM from telephone number (409) 291-7003;
 dix. January 9, 2015 at 1:46 PM from telephone number (409) 291-7003;
 dx. January 9, 2015 at 3:12 PM from telephone number (409) 291-7003;
 dxi. January 10, 2015 at 2:08 PM from telephone number (409) 291-8588;
 dxii. January 10, 2015 at 7:47 PM from telephone number (409) 291-8588;
 dxiii. January 12, 2015 at 8:49 AM from telephone number (409) 299-3557;
 dxiv. January 12, 2015 at 8:50 AM from telephone number (409) 299-3557;
 dxv. January 12, 2015 at 11:37 AM from telephone number (409) 299-3557;
 dxvi. January 12, 2015 at 12:34 PM from telephone number (409) 299-3557;
 dxvii. January 12, 2015 at 6:56 PM from telephone number (409) 299-3557;
 dxviii. January 12, 2015 at 7:01 PM from telephone number (409) 299-3557;
 dxix. January 13, 2015 at 8:59 AM from telephone number (409) 291-5136;
 dxx. January 13, 2015 at 9:00 AM from telephone number (409) 291-5136;
 dxxi. January 13, 2015 at 8:28 AM from telephone number (409) 291-5136;
 dxxii. January 13, 2015 at 11:35 AM from telephone number (409) 291-5136;
 dxxiii. January 13, 2015 at 11:52 AM from telephone number (409) 291-5136;
 dxxiv. January 14, 2015 at 8:49 AM from telephone number (409) 299-3561;
 dxxv. January 14, 2015 at 10:19 AM from telephone number (409) 299-3561;
 dxxvi. January 14, 2015 at 1:05 PM from telephone number (409) 299-3561;
 dxxvii. January 14, 2015 at 1:06 PM from telephone number (409) 299-3561;
 dxxviii. January 14, 2015 at 8:43 PM from telephone number (409) 299-3561;
 dxxix. January 15, 2015 at 8:56 AM from telephone number (409) 299-4593;
 dxxx. January 15, 2015 at 8:57 AM from telephone number (409) 299-4593;
 dxxxi. January 15, 2015 at 10:21 AM from telephone number (409) 299-4593;
 dxxxii. January 15, 2015 at 11:20 AM from telephone number (409) 299-4593;
 dxxxiii. January 15, 2015 at 11:21 AM from telephone number (409) 299-4593;
 dxxxiv. January 15, 2015 at 7:05 PM from telephone number (409) 299-4593;
 dxxxv. January 15, 2015 at 7:36 PM from telephone number (409) 299-4593;
 dxxxvi. January 16, 2015 at 8:59 AM from telephone number (409) 299-4610;
 dxxxvii. January 16, 2015 at 11:35 AM from telephone number (409) 299-4610;
 dxxxviii. January 16, 2015 at 11:39 AM from telephone number (409) 299-4610;

dxxxix. January 16, 2015 at 3:29 PM from telephone number (409) 299-4610;
 dxl. January 16, 2015 at 4:23 PM from telephone number (409) 299-4610;
 dxli. January 16, 2015 at 5:33 PM from telephone number (409) 299-4610;
 dxlii. January 16, 2015 at 5:42 PM from telephone number (409) 299-4610;
 dxliii. January 17, 2015 at 8:41 AM from telephone number (409) 242-6994;
 dxliv. January 17, 2015 at 12:09 PM from telephone number (409) 242-6994;
 dxlv. January 17, 2015 at 12:10 PM from telephone number (409) 242-6994;
 dxlvi. January 19, 2015 at 9:22 AM from telephone number (409) 293-3121;
 dxlvii. January 19, 2015 at 6:58 PM from telephone number (409) 293-3121;
 dxlviii. January 20, 2015 at 10:05 AM from telephone number (409) 293-3122;
 dxlix. January 20, 2015 at 12:53 PM from telephone number (409) 293-3122;
 dl. January 20, 2015 at 12:55 PM from telephone number (409) 293-3122;
 dli. January 20, 2015 at 7:56 PM from telephone number (409) 293-3122;
 dlii. January 21, 2015 at 9:23 AM from telephone number (409) 293-3123;
 dliii. January 21, 2015 at 11:25 AM from telephone number (409) 293-3123;
 dliiv. January 21, 2015 at 11:26 AM from telephone number (409) 293-3123;
 dliv. January 21, 2015 at 8:38 PM from telephone number (409) 293-3123;
 dlvi. January 21, 2015 at 8:39 PM from telephone number (409) 293-3123;
 dlvii. January 22, 2015 at 8:54 AM from telephone number (409) 299-5994;
 dlviii. January 22, 2015 at 11:01 AM from telephone number (409) 299-5994;
 dlix. January 22, 2015 at 11:01 AM from telephone number (409) 299-5994;
 dlx. January 22, 2015 at 8:41 PM from telephone number (409) 299-5994;
 dlxi. January 23, 2015 at 8:26 AM from telephone number (409) 761-5430;
 dlxii. January 23, 2015 at 11:05 AM from telephone number (409) 761-5430;
 dlxiii. January 23, 2015 at 1:50 PM from telephone number (409) 761-5430;
 dlxiv. January 23, 2015 at 3:31 PM from telephone number (409) 761-5430;
 dlxv. January 23, 2015 at 7:28 PM from telephone number (409) 761-5430;
 dlxvi. January 24, 2015 at 9:00 AM from telephone number (409) 761-5431;
 dlxvii. January 24, 2015 at 12:15 PM from telephone number (409) 761-5431;
 dlxviii. January 26, 2015 at 10:44 AM from telephone number (409) 291-5865;
 dlxix. January 26, 2015 at 11:08 AM from telephone number (409) 291-5865;
 dlxx. January 26, 2015 at 4:54 PM from telephone number (409) 291-5865;
 dlxxi. January 26, 2015 at 4:55 PM from telephone number (409) 291-5865;
 dlxxii. January 26, 2015 at 6:45 PM from telephone number (409) 291-5865;
 dlxxiii. January 27, 2015 at 9:11 AM from telephone number (409) 291-5864;
 dlxxiv. January 27, 2015 at 10:42 AM from telephone number (409) 291-5864;
 dlxxv. January 27, 2015 at 11:28 AM from telephone number (409) 291-5864;
 dlxxvi. January 27, 2015 at 8:22 PM from telephone number (409) 291-5864;
 dlxxvii. January 27, 2015 at 8:31 PM from telephone number (409) 291-5864;
 dlxxviii. January 28, 2015 at 12:25 PM from telephone number (409) 291-5006;
 dlxxix. January 28, 2015 at 12:39 PM from telephone number (409) 291-5006;
 dlxxx. January 28, 2015 at 8:31 PM from telephone number (409) 291-5006;
 dlxxxi. January 29, 2015 at 8:31 AM from telephone number (409) 291-5844;
 dlxxxii. January 30, 2015 at 8:20 AM from telephone number (409) 291-5870;
 dlxxxiii. January 30, 2015 at 9:44 AM from telephone number (409) 291-5870;
 dlxxxiv. January 30, 2015 at 3:16 PM from telephone number (409) 291-5870;

dlxxxv. January 30, 2015 at 5:49 PM from telephone number (409) 291-5870;
dlxxxvi. January 30, 2015 at 5:50 PM from telephone number (409) 291-5870;
dlxxxvii. January 30, 2015 at 8:22 AM from telephone number (409) 291-5870;
dlxxxviii. January 31, 2015 at 8:44 AM from telephone number (409) 291-5864;
dlxxxix. January 31, 2015 at 12:08 PM from telephone number (409) 291-5864; and
dxc. January 31, 2015 at 3:00 PM from telephone number (409) 291-5864.

33. Upon information and belief, the telephone calls Defendant placed to Ms. Barnes were placed using an ATDS, without human intervention.

34. Ms. Barnes noted a pause and/or click prior to the representative requesting to speak to Mr. Isaac Barnes on several of the answered calls she received from Defendant.

35. Each call Defendant placed to Ms. Barnes was placed using an ATDS which has the capacity to store or produce telephone numbers to be called, using a random or sequential number generator; and to dial such numbers as specified by 47 U.S.C § 227(a)(1).

36. Each call Defendant placed to Ms. Barnes' cellular telephone was done so without the "express permission" of Ms. Barnes.

37. Defendant has a corporate policy to use an ATDS or a pre-recorded or artificial voice to individuals just as they did to Ms. Barnes' cellular telephone in this case.

38. Defendant has a corporate policy to use an ATDS or a pre-recorded or artificial voice, just as they did to Ms. Barnes' cellular telephone in this case, with no way for the consumer, or Defendant, to remove the incorrect number.

39. Defendant's corporate policy is structured so as to continue to call individuals like Ms. Barnes, despite these individuals explaining to Defendant they are the incorrect individual and/or party in which Defendant is attempting to contact.

40. Defendant has numerous other federal lawsuits pending against them alleging similar violations as stated in this Complaint.

41. Defendant has numerous complaints against them across the country asserting that their ATDS continues to call the wrong individual.

42. Defendant has had numerous complaints against it from consumers across the country asking to not be called, however Defendant continues to call these individuals.

43. Defendant's corporate policy provided no means for Ms. Barnes to have her cellular telephone number removed from Defendant's call list and/or added to Defendant's "do not call" list.

44. Defendant has a corporate policy to harass and abuse individuals despite actual knowledge the called parties do not wish to be called.

45. Defendant has a corporate policy to harass and abuse individuals despite actual knowledge the called party is not party Defendant is intending to call.

46. Ms. Barnes did not expressly consent to Defendant's placement of telephone calls to her cellular telephone by the use of an ATDS or a pre-recorded or artificial voice prior to Defendant's placement of the calls.

47. Not one of the telephone calls placed by Defendant to Ms. Barnes were for "emergency purposes" as specified in 47 U.S.C. § 227(b)(1)(A).

48. Defendant willfully and/or knowingly violated the TCPA with respect to Ms. Barnes.

49. As a result of aforementioned tenacious collection efforts, Plaintiff was affected, both personally and individually, as he experienced an invasion of privacy, loss of happiness, concentration, severe stress, emotional distress, headaches and incurred medical expenses resulting from the attempted collection of the subject account.

COUNT I
(Violation of the TCPA)

50. Ms. Barnes incorporates and realleges paragraphs one (1) through forty-nine (49) as if fully set forth herein.

51. Defendant willfully violated the TCPA with respect to Ms. Barnes, specifically for each of the auto-dialer calls made to Ms. Barnes' cellular telephone after Ms. Barnes notified Defendant that they were calling the wrong number and to stop immediately calling her.

52. Defendant knowingly violated the TCPA with respect to Ms. Barnes, specifically for each of the auto-dialer calls made to Ms. Barnes' cellular telephone after she notified Defendant that they called the wrong number and to stop calling her.

53. Defendant repeatedly placed non-emergency telephone calls to Ms. Barnes' cellular telephone using an automatic telephone dialing system or prerecorded or artificial voice without Ms. Barnes' prior express consent in direct violation of federal law, including 47 U.S.C § 227(b)(1)(A)(iii).

WHEREFORE, Plaintiff respectfully demands a trial by jury on all issues so triable and judgment against for statutory damages, punitive damages, actual damages, costs, interest, attorney fees, enjoinder from further violations of these parts and any other such relief the court may deem just and proper.

Respectfully submitted,



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